



Matt Blunt, Governor • Doyle Childers, Director

## DEPARTMENT OF NATURAL RESOURCES

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APR 18 2006

Mr. Steven K. Wakefield, Vice President, Operations  
Superior Solvents and Chemicals, Inc. - Springfield  
2055 E. Blaine St.  
Springfield, MO 65803

Re: Superior Solvents and Chemicals, Inc. - Springfield: 077-0228  
Permit Number: **OP2006-022**

Dear Mr. Wakefield:

Enclosed with this letter is your intermediate operating permit. Please review this document carefully. Operation of your installation in accordance with the rules and regulations cited in this document is necessary for continued compliance. It is very important that you read and understand the requirements contained in your permit.

If you have any questions or need additional information regarding this permit, please contact the Air Pollution Control Program (APCP) at (573) 751-4817, or you may write to the Department of Natural Resources' Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102.

Sincerely,

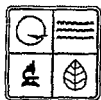
AIR POLLUTION CONTROL PROGRAM

Michael J. Stansfield, P.E.  
Operating Permit Unit Chief

MJS:csb

Enclosure

c: Ms. Tamara Freeman, U.S. EPA Region VII  
Mr. Paul Vitzthum, Southwest Regional Office  
PAMS File: 2004-10-052



**Missouri Department of Natural Resources**  
**Air Pollution Control Program**

## **INTERMEDIATE STATE PERMIT TO OPERATE**

Under the authority of RSMo 643 and the Federal Clean Air Act the applicant is authorized to operate the air contaminant source(s) described below, in accordance with the laws, rules, and conditions set forth here in.

**Intermediate Operating Permit Number:** OP 2006-022

**Expiration Date:** APR 17 2011

**Installation ID:** 077-0228

**Project Number:** 2004-10-052

**Installation Name and Address**

Superior Solvents and Chemicals, Inc. - Springfield  
2055 E. Blaine St.  
Springfield, MO 65803  
Greene County

**Parent Company's Name and Address**

Superior Oil Company, Inc.  
400 W. Regent Street  
Indianapolis, IN 46225

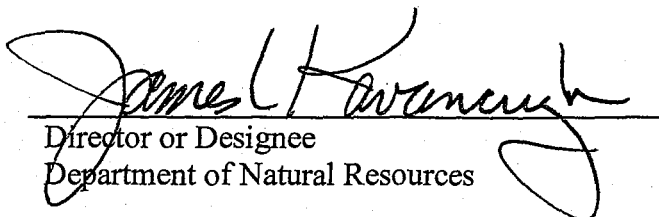
**Installation Description:**

This is a solvent blending and distribution facility. It stores, handles, blends and distributes a large number of solvents and chemicals. The major operations are:

- (1) receipt, unloading and storage of bulk liquid chemicals and solvents;
- (2) loading of outgoing tankers for delivery to customers;
- (3) transfer and filling of containers for storage and for delivery to customers, from bulk storage tanks or incoming tankers; and
- (4) blending of custom solvent mixtures for bulk delivery to customers of for transfer into containers.

APR 18 2006

Effective Date

  
Director or Designee  
Department of Natural Resources

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## I. Installation Description and Equipment Listing

### INSTALLATION DESCRIPTION

This is a solvent blending and distribution facility. It stores, handles, blends and distributes a large number of solvents and chemicals. The major operations are:

- 1) receipt, unloading and storage of bulk liquid chemicals and solvents;
- 2) loading of outgoing tankers for delivery to customers;
- 3) transfer and filling of containers for storage and for delivery to customers, from bulk storage tanks or incoming tankers; and
- 4) blending of custom solvent mixtures for bulk delivery to customers or for transfer into containers.

Reported Air Pollutant Emissions, tons per year							
Year	Particulate Matter ≤ Ten Microns (PM-10)	Sulfur Oxides (SO <sub>x</sub> )	Nitrogen Oxides (NO <sub>x</sub> )	Volatile Organic Compounds (VOC)	Carbon Monoxide (CO)	Lead (Pb)	Hazardous Air Pollutants (HAPs)
2004	-	-	-	1.29	-	-	1.54
2003	-	-	-	1.30	-	-	1.50
2002	-	-	-	0.54	-	-	0.72
2001	-	-	-	0.72	-	-	0.002
2000	-	-	-	1.06	-	-	0.09

### EMISSION UNITS WITH LIMITATIONS

The following list provides a description of the equipment at this installation which emits air pollutants and which is identified as having unit-specific emission limitations.

<u>Emission Unit #</u>	<u>Description of Emission Unit</u>	<u>EIQ Point #</u>
EU0010	Two 1 MMBtu/hr boilers	

### EMISSION UNITS WITHOUT LIMITATIONS

The following list provides a description of the equipment which does not have unit specific limitations at the time of permit issuance.

#### Description of Emission Source

Fugitive emissions off tank farm, unloading solvents, etc. (EP1)  
Container filling (EP2)  
Loading rack (EP3)  
Six 1983, 10,000-gallon, above-ground storage tanks (Tanks 1 through 6, EP4)  
Two 1983, 6,500-gallon, above-ground storage tanks (Tanks 7 and 8, EP4)  
Six 1983, 4,300-gallon, above-ground storage tanks (Tanks 9, 11, 12, 14, 15, and 17, EP4)  
Three 1983, 3,100-gallon, above-ground storage tanks (Tanks 10, 13, and 16, EP4)  
Three 1983, 1,000-gallon, above-ground storage tanks (Tanks 18, 19 and 20, EP4)  
Blending operation in Tank 21, 1990, 1,500-gallon (EP5)  
Equipment cleaning  
Truck refueling

Fork truck cylinder changes  
Sampling of products from bulk loads  
Minimal laboratory operations  
Minimal particulate emissions possible from gravel areas  
Tote washing operations – water-based products.

**DOCUMENTS INCORPORATED BY REFERENCE**

These documents have been incorporated by reference into this permit:

None.

## II. Plant Wide Emission Limitations

The installation shall comply with the following emission limitations.

### PERMIT CONDITION PW001

10 CSR 10-6.065(2)(C) and 10 CSR 10-6.065(5)(A) Voluntary Limitation(s)

#### Emission Limitations:

- 1) The permittee shall discharge into the atmosphere from the entire installation no more than 99.00 tons of volatile organic compounds (VOC) in any consecutive 12-month period.
- 2) The permittee shall discharge into the atmosphere from the entire installation no more than 9.0 tons of any individual hazardous air pollutant (HAP) in any consecutive 12-month period.
- 3) The permittee shall discharge into the atmosphere from the entire installation no more than 24.0 tons of all HAP combined in any consecutive 12-month period.

#### Monitoring/Record Keeping:

- 1) The permittee shall maintain an accurate record of emissions of VOC and HAP emitted into the atmosphere from this installation. The permittee shall record the monthly and running 12-month totals of the VOC and HAP emissions from this facility. Attachments A1, A2, and A3 contain forms including these recordkeeping requirements. The permittee shall use these forms, or equivalent forms created by the permittee for this purpose.
- 2) The permittee shall maintain these records on-site for the most recent 60 months.
- 3) The permittee shall immediately make such records available to any Department of Natural Resources or Springfield Air Pollution Control Authority personnel upon request.

#### Reporting:

The permittee shall report to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, and to the Springfield Air Pollution Control Authority, 227 East Chestnut Expressway, Springfield, MO 65802, no later than ten days after the end of the month, if the 12-month cumulative total records show that the source exceeded any of the three emission limitations.

### III. Emission Unit Specific Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued.

EU0010 – BOILERS	
Emission Unit	Description
EU0010	Two 1983, 1MMBtu/hr, natural gas fired boilers

#### PERMIT CONDITION EU0010-001

10 CSR 10-4.040, Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating

##### Emission Limitation:

The permittee shall not emit particulate matter from this emission unit in excess of 1.2 pounds per hour.

##### Operational Limitation

These boilers shall be limited to burning pipeline grade natural gas.

##### Monitoring/Recordkeeping:

- 1) The permittee shall maintain documentation supporting that the fuel used in these boilers is pipeline grade natural gas.
- 2) The permittee will be in compliance with this regulation as long these boilers burn pipeline grade natural gas exclusively. Calculations demonstrating this are in Attachment B. The permittee shall keep this attachment with the rest of this permit.
- 3) These records shall be made available immediately for inspection to Department of Natural Resources or Springfield Air Pollution Control Authority personnel upon request.

##### Reporting:

The permittee shall report any deviations/exceedances of this permit condition using the annual monitoring report and compliance certification required by Section IV of this permit.

#### PERMIT CONDITION EU0010-002

10 CSR 10-6.220, Restriction of Emission of Visible Air Contaminants

##### Emission Limitations:

- 1) No owner or other person shall cause or permit emissions to be discharged into the atmosphere from any new source any visible emissions with an opacity greater than 20%.
- 2) Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any 60 minutes air contaminants with an opacity up to 60%.

##### Operational Limitation

These boilers shall be limited to burning pipeline grade natural gas.

**Monitoring/Recordkeeping/Reporting:**

Since the Operational Limitation for this permit condition is the same as for Permit Condition EU0010-001, the requirements in Monitoring/Recordkeeping 1) and 3) and in Reporting for that permit condition also suffice to demonstrate compliance with this permit condition. No additional monitoring, recordkeeping, or reporting is required for this permit condition.

**PERMIT CONDITION EU0010-003**

**10 CSR 10-6.260 Restriction of Emission of Sulfur Compounds**

**Emission Limitation:**

No person shall cause or allow emissions of sulfur dioxide into the atmosphere from any indirect heating source in excess of eight pounds of sulfur dioxide per million BTUs actual heat input averaged on any consecutive three hour time period

**Operational/Equipment Limitation:**

These boilers shall be limited to burning pipeline grade natural gas.

**Monitoring/Recordkeeping/Reporting:**

Since the Operational Limitation for this permit condition is the same as for Permit Condition EU0010-001, the requirements in Monitoring/Recordkeeping 1) and 3) and in Reporting for that permit condition also suffice to demonstrate compliance with this permit condition. No additional monitoring, recordkeeping, or reporting is required for this permit condition.

Note: The current version of 10 CSR 10-6.260 (May 30, 2004, effective date) exempts combustion equipment that exclusively uses pipeline grade natural gas or liquefied petroleum gas, or any combination of these fuels, from the requirements of this rule. Therefore, when the provisions of the current version of 10 CSR 10-6.260 are incorporated into the federally approved SIP as a final EPA action, the emission units will not be subject to 10 CSR 10-6.260 and this permit condition will no longer be an applicable requirement in this operating permit.



## IV. Core Permit Requirements

The installation shall comply with each of the following requirements. Consult the appropriate sections in the Code of Federal Regulations (CFR), Code of State Regulations (CSR), and local ordinances for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued.

### **Springfield City Code Article IX Breakdown of Equipment**

In the event that emissions as a direct result of upset conditions or breakdown exceed any of the established limits, the permittee shall advise the city of Springfield Director of Health of such a breakdown and outline a corrective program acceptable to the Director.

**This requirement is not federally or state enforceable.**

### **10 CSR 10-6.050 Start-up, Shutdown and Malfunction Conditions**

- 1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the director within two business days, in writing, the following information:
  - a) Name and location of installation;
  - b) Name and telephone number of person responsible for the installation;
  - c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
  - d) Identity of the equipment causing the excess emissions;
  - e) Time and duration of the period of excess emissions;
  - f) Cause of the excess emissions;
  - g) Air pollutants involved;
  - h) Best estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;
  - i) Measures taken to mitigate the extent and duration of the excess emissions; and
  - j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
- 2) The permittee shall submit the paragraph 1 information list to the director in writing at least ten days prior to any maintenance, start-up or shutdown, which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, it shall be given as soon as practicable prior to the release. If an unplanned excess release of emissions exceeding one hour occurs during maintenance, start-up or shutdown, the director shall be notified verbally as soon as practical during normal working hours and no later than the close of business of the following working day. A written notice shall follow within ten working days.
- 3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the paragraph 1 list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other pertinent information available, the director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under section 643.080 or 643.151, RSMo.

- 4) Nothing in this rule shall be construed to limit the authority of the director or commission to take appropriate action, under sections 643.080, 643.090 and 643.151, RSMo to enforce the provisions of the Air Conservation Law and the corresponding rule.
- 5) Compliance with this rule does not automatically absolve the permittee of liability for the excess emissions reported.

#### **Springfield City Code Article II Construction Permits Required**

The permittee shall not commence construction, modification, or major modification of any installation subject to this rule, begin operation after that construction, modification, or major modification, or begin operation of any installation which has been shut down longer than five years without first obtaining a permit from the permitting authority.

#### **10 CSR 10-6.065 Operating Permits**

The permittee shall file a complete application for renewal of this operating permit at least six months before the date of permit expiration. In no event shall this time be greater than eighteen months. [10 CSR 10-6.065(5)(B)1.A(III)] The permittee shall retain the most current operating permit issued to this installation on-site. [10 CSR 10-6.065, §(5)(C)(1) and §(6)(C)1.C(II)] The permittee shall immediately make such permit available to any Missouri Department of Natural Resources or Springfield Air Pollution Control Authority personnel upon request. [10 CSR 10-6.065, §(5)(C)(1) and §(6)(C)3.B]

#### **10 CSR 10-6.110 Submission of Emission Data, Emission Fees and Process Information**

- 1) The permittee shall complete and submit an Emission Inventory Questionnaire (EIQ) in accordance with the requirements outlined in this rule.
- 2) The permittee shall pay an annual emission fee per ton of regulated air pollutant emitted according to the schedule in the rule. This fee is an emission fee assessed under authority of RSMo. 643.079.
- 3) The fees shall be due April 1 each year for emissions produced during the previous calendar year. The fees shall be payable to the Department of Natural Resources and shall be accompanied by the Emissions Inventory Questionnaire (EIQ) form or equivalent approved by the director.

#### **10 CSR 10-6.130 Controlling Emissions During Episodes of High Air Pollution Potential**

This rule specifies the conditions that establish an air pollution alert (yellow/orange/red/purple), or emergency (maroon) and the associated procedures and emission reduction objectives for dealing with each. The permittee shall submit an appropriate emergency plan if required by the Director.

#### **10 CSR 10-6.150 Circumvention**

The permittee shall not cause or permit the installation or use of any device or any other means which, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes an emission or air contaminant which violates a rule of the Missouri Air Conservation Commission.

#### **10 CSR 10-6.170 Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin**

- 1) The permittee shall not cause or allow to occur any handling, transporting or storing of any material; construction, repair, cleaning or demolition of a building or its appurtenances; construction or use of a road, driveway or open area; or operation of a commercial or industrial installation without applying reasonable measures as may be required to prevent, or in a manner which allows or may allow, fugitive particulate matter emissions to go beyond the premises of origin in quantities that the

particulate matter may be found on surfaces beyond the property line of origin. The nature or origin of the particulate matter shall be determined to a reasonable degree of certainty by a technique proven to be accurate and approved by the director.

- 2) The permittee shall not cause nor allow to occur any fugitive particulate matter emissions to remain visible in the ambient air beyond the property line of origin.
- 3) Should it be determined that noncompliance has occurred, the director may require reasonable control measures as may be necessary. These measures may include, but are not limited to, the following:
  - a) Revision of procedures involving construction, repair, cleaning and demolition of buildings and their appurtenances that produce particulate matter emissions;
  - b) Paving or frequent cleaning of roads, driveways and parking lots;
  - c) Application of dust-free surfaces;
  - d) Application of water; and
  - e) Planting and maintenance of vegetative ground cover.

#### **10 CSR 10-6.180 Measurement of Emissions of Air Contaminants**

- 1) The director may require any person responsible for the source of emission of air contaminants to make or have made tests to determine the quantity or nature, or both, of emission of air contaminants from the source. The director may specify testing methods to be used in accordance with good professional practice. The director may observe the testing. All tests shall be performed by qualified personnel.
- 2) The director may conduct tests of emissions of air contaminants from any source. Upon request of the director, the person responsible for the source to be tested shall provide necessary ports in stacks or ducts and other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices as may be necessary for proper determination of the emission of air contaminants.
- 3) The director shall be given a copy of the test results in writing and signed by the person responsible for the tests.

#### **10 CSR 10-4.090 or Springfield City Code Article IV Open Burning Restrictions**

- 1) The permittee shall not conduct, cause, permit or allow a salvage operation, the disposal of trade wastes or burning of refuse by open burning.
- 2) Exception - Open burning of trade waste or vegetation may be permitted only when it can be shown that open burning is the only feasible method of disposal or an emergency exists which requires open burning.
- 3) Any person intending to engage in open burning shall file a request to do so with the director. The request shall include the following:
  - a) The name, address and telephone number of the person submitting the application; The type of business or activity involved; A description of the proposed equipment and operating practices, the type, quantity and composition of trade wastes and expected composition and amount of air contaminants to be released to the atmosphere where known;
  - b) The schedule of burning operations;
  - c) The exact location where open burning will be used to dispose of the trade wastes;
  - d) Reasons why no method other than open burning is feasible; and
  - e) Evidence that the proposed open burning has been approved by the fire control authority which has jurisdiction.
- 4) Upon approval of the open burning permit application by the director, the person may proceed with the operation under the terms of the open burning permit. Be aware that such approval shall not

exempt Superior Solvents and Chemicals, Inc. - Springfield from the provisions of any other law, ordinance or regulation.

- 5) The permittee shall maintain files with letters from the director approving the open burning operation and previous DNR inspection reports.

#### **10 CSR 10-4.070 Restriction on Emission of Odors**

No person may cause, permit or allow the emission of odorous matter in concentrations and frequencies or for durations that odor can be perceived when one volume of odorous air is diluted with seven volumes of odor-free air for two separate trials not less than 15 minutes apart within the period of one hour.

**This requirement is not federally enforceable.**

#### **Springfield City Code Article VI Control of Odors in the Ambient Air**

No person shall emit odorous matter as to cause an objectionable odor on or adjacent to:

- 1) Residential, recreational, institutional, retail sales, hotel or educational premises.
- 2) Industrial premises when air containing odorous matter is diluted with 20 or more volumes of odor-free air; or
- 3) Premises other than those in 1. and 2 above when air containing odorous matter is diluted with four or more volumes of odor-free air.

The previously mentioned requirement shall apply only to objectionable odors. An odor will be deemed objectionable when 30% or more of a sample of the people exposed to it believe it to be objectionable in usual places of occupancy; the sample size to be at least 20 people or 75% of those exposed if fewer than 20 people are exposed.

**This requirement is not federally enforceable.**

#### **Springfield City Code Article VII Air Pollution Nuisances**

It is unlawful for any person to cause, allow or permit the escape of gases or particulate matter from any source whatsoever in such a manner or in such quantities as to unreasonably endanger the health, safety or welfare of any person or of the public, or in such quantities or in such a manner as to cause unreasonable injury or damage to property or businesses. The escape of such matter is declared to be a public nuisance.

**This requirement is not federally enforceable.**

#### **Title VI – 40 CFR Part 82 Protection of Stratospheric Ozone**

- 1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
  - a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to §82.106.
  - b) The placement of the required warning statement must comply with the requirements pursuant to §82.108.
  - c) The form of the label bearing the required warning statement must comply with the requirements pursuant to §82.110.
  - d) No person may modify, remove, or interfere with the required warning statement except as described in §82.112.

- 2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:
  - a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
  - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
  - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
  - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to §82.166. ("MVAC-like" appliance as defined at §82.152).
  - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156.
  - f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
- 3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.
- 4) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.

The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. *Federal Only - 40 CFR part 82*

<b>10 CSR 10-6.280 Compliance Monitoring Usage</b>
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- 1) The permittee is not prohibited from using the following in addition to any specified compliance methods for the purpose of submission of compliance certificates:
  - a) Monitoring methods outlined in 40 CFR Part 64;
  - b) Monitoring method(s) approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
  - c) Any other monitoring methods approved by the director.
- 2) Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of any such plan or other applicable requirement. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred by a permittee:
  - a) Monitoring methods outlined in 40 CFR Part 64;
  - b) A monitoring method approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
  - c) Compliance test methods specified in the rule cited as the authority for the emission limitations.

- 3) The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
- a) Applicable monitoring or testing methods, cited in:
    - i) 10 CSR 10-6.030, "Sampling Methods for Air Pollution Sources";
    - ii) 10 CSR 10-6.040, "Reference Methods";
    - iii) 10 CSR 10-6.070, "New Source Performance Standards";
    - iv) 10 CSR 10-6.080, "Emission Standards for Hazardous Air Pollutants"; or
  - b) Other testing, monitoring, or information gathering methods, if approved by the director, that produce information comparable to that produced by any method listed above.

## V. General Permit Requirements

The installation shall comply with each of the following requirements. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued.

### 10 CSR 10-6.065, §(5)(C)1 and §(6)(C)1.B Permit Duration

This permit is issued for a term of five years, commencing on the date of issuance. This permit will expire at the end of this period unless renewed.

### 10 CSR 10-6.065, §(5)(C)1 and §(6)(C)1.C General Record Keeping and Reporting Requirements

- 1) Record Keeping
  - a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
  - b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources or Springfield Air Pollution Control Authority personnel upon request.
- 2) Reporting
  - a) All reports shall be submitted to the Air Pollution Control Program, Enforcement Section, P. O. Box 176, Jefferson City, MO 65102, and to the Springfield Air Pollution Control Authority, 227 East Chestnut Expressway, Springfield, MO 65802.
  - b) The permittee shall submit a report of all required monitoring by:
    - i) April 1st for monitoring which covers the January through December time period.
    - ii) Exception. Monitoring requirements which require reporting more frequently than annually shall report no later than 30 days after the end of the calendar quarter in which the measurements were taken.
  - c) Each report shall identify any deviations from emission limitations, monitoring, record keeping, reporting, or any other requirements of the permit.
  - d) Submit supplemental reports as required or as needed. Supplemental reports are required no later than ten days after any exceedance of any applicable rule, regulation or other restriction. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
    - i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7 of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.

- ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.
- iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's annual report shall be reported on the schedule specified in this permit, and no later than ten days after any exceedance of any applicable rule, regulation, or other restriction.
- e) Every report submitted shall be certified by the responsible official, except that, if a report of a deviation must be submitted within ten days after the deviation, the report may be submitted without a certification if the report is resubmitted with an appropriate certification within ten days after that, together with any corrected or supplemental information required concerning the deviation.
- f) The permittee may request confidential treatment of information submitted in any report of deviation.

**10 CSR 10-6.065 §(5)(C)1 and §(6)(C)1.D Risk Management Plan Under Section 112(r)**

The permittee shall comply with the requirements of 40 CFR Part 68, Accidental Release Prevention Requirements. If the permittee has more than a threshold quantity of a regulated substance in process, as determined by 40 CFR Section 68.115, the permittee shall submit a Risk Management Plan in accordance with 40 CFR Part 68 no later than the latest of the following dates:

- 1) June 21, 1999;
- 2) Three years after the date on which a regulated substance is first listed under 40 CFR Section 68.130; or
- 3) The date on which a regulated substance is first present above a threshold quantity in a process.

**10 CSR 10-6.065(5)(C)1.A General Requirements**

- 1) The permittee must comply with all of the terms and conditions of this permit. Any noncompliance with a permit condition constitutes a violation and is grounds for enforcement action, permit termination, permit revocation and re-issuance, permit modification or denial of a permit renewal application.
- 2) The permittee may not use as a defense in an enforcement action that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit
- 3) The permit may be modified, revoked, reopened, reissued or terminated for cause. Except as provided for minor permit modifications, the filing of an application or request for a permit modification, revocation and reissuance, or termination, or the filing of a notification of planned changes or anticipated noncompliance, does not stay any permit condition.
- 4) This permit does not convey any property rights of any sort, nor grant any exclusive privilege.
- 5) The permittee shall furnish to the Air Pollution Control Program, upon receipt of a written request and within a reasonable time, any information that the Air Pollution Control Program reasonably may require to determine whether cause exists for modifying, reopening, reissuing or revoking the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the Air Pollution Control Program copies of records required to be kept by the permittee. The permittee may make a claim of confidentiality for any information or records submitted under this rule.
- 6) Failure to comply with the limitations and conditions that qualify the installation for an Intermediate permit make the installation subject to the provisions of 10 CSR 10-6.065(6) and enforcement action for operating without a valid part 70 operating permit.



**10 CSR 10-6.065(5)(C)1.C Reasonably Anticipated Operating Scenarios**

The solvents and chemicals handled by this installation vary based on customer demand. This permit puts no restrictions on what solvents and chemicals are handled or in which tanks they are stored.

**110 CSR 10-6.065, §(5)(B)4; §(5)(C)1, §(6)(C)3.B, and §(6)(C)3.D; and §(5)(C)3, and §(6)(C)3.E.(I) – (III) and (V) – (VI) Compliance Requirements**

- 1) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.
- 2) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized agents, to perform the following (subject to the installation's right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):
  - a) Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
  - b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
  - c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
  - d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.
- 3) All progress reports required under an applicable schedule of compliance shall be submitted semiannually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:
  - a) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
  - b) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.
- 4) The permittee shall submit an annual certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. These certifications shall be submitted annually by April 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, and to the Springfield Air Pollution Control Authority, 227 East Chestnut Expressway, Springfield, MO 65802. All deviations and exceedances must be included in the compliance certifications. The compliance certification shall include the following:
  - a) The identification of each term or condition of the permit that is the basis of the certification;
  - b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;
  - c) Whether compliance was continuous or intermittent;
  - d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period; and
  - e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

**10 CSR 10-6.065, §(5)(C)1 and §(6)(C)7 Emergency Provisions**

- 1) An emergency or upset as defined in 10 CSR 10-6.065(6)(C)7.A shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emissions limitations. To establish an emergency- or upset-based defense, the permittee must demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence, the following:
  - a) That an emergency or upset occurred and that the permittee can identify the source of the emergency or upset,
  - b) That the installation was being operated properly,
  - c) That the permittee took all reasonable steps to minimize emissions that exceeded technology-based emissions limitations or requirements in this permit, and
  - d) That the permittee submitted notice of the emergency to the Air Pollution Control Program within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.
- 2) Be aware that an emergency or upset shall not include noncompliance caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

**10 CSR 10-6.065(5)(C)5 Off-Permit Changes**

- 1) Except as noted below, the permittee may make any change in its permitted installation's operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Off-permit changes shall be subject to the following requirements and restrictions:
  - a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is a Title I modification; Please Note: Changes at the installation which affect the emission limitation(s) classifying the installation as an intermediate source (add additional equipment to the record keeping requirements, increase the emissions above major source level) do not qualify for off-permit changes.
  - b) The permittee must provide written notice of the change to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, and to the Springfield Air Pollution Control Authority, 227 East Chestnut Expressway, Springfield, MO 65802, as well as EPA Region VII, 901 North 5th Street, Kansas City, Kansas 66101, no later than the next annual emissions report. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change; and
  - c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes.

**10 CSR 10-6.020(2)(R)12 Responsible Official**

The application utilized in the preparation of this permit was signed by Steven K. Wakefield, Vice President, Operations. If this person terminates employment, or is reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Director of the Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within 30 days of the change. The notification shall include the name and title of the new person

assigned by the source owner or operator to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

**10 CSR 10-6.065 §(5)(E)4 and §(6)(E)6.A(III)(a)-(c) Reopening-Permit for Cause**

This permit may be reopened for cause if:

- 1) The Missouri Department of Natural Resources (MDNR) or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,
- 2) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if—:
  - a) The permit has a remaining term of less than three years;
  - b) The effective date of the requirement is later than the date on which the permit is due to expire; or
  - c) The additional applicable requirements are implemented in a general permit that is applicable to the installation and the installation receives authorization for coverage under that general permit,
- 3) MDNR or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

**10 CSR 10-6.065 §(5)(E)1.A and §(6)(E)1.C Statement of Basis**

This permit is accompanied by a statement setting forth the legal and factual basis for the draft permit conditions (including references to applicable statutory or regulatory provisions). This Statement of Basis, while referenced by the permit, is not an actual part of the permit.

## **VI. Attachments**

Attachments follow.

**ATTACHMENT A1**  
**Monthly VOC Emissions Tracking Record**  
For month of \_\_\_\_\_, year of \_\_\_\_\_<sup>1</sup>

Company Name: Superior Solvents and Chemicals, Inc - Springfield  
Facility Location: 2055 E. Blaine St., Springfield, MO 65803

Greene County

Facility ID: 077-0228

Column A <sup>1</sup>	Column B	Column C <sup>2</sup>	Column D <sup>3</sup>
Emission Source	Amount of Material Processed (gallons)	VOC Emission Factor (pounds/gallon)	Monthly VOC Emissions (tons)
Tank 1			
Tank 2			
Tank 3			
Tank 4			
Tank 5			
Tank 6			
Tank 7			
Tank 8			
Tank 9			
Tank 10			
Tank 11			
Tank 12			
Tank 13			
Tank 14			
Tank 15			
Tank 16			
Tank 17			
Tank 18			
Tank 19			
Tank 20			
Container filling			
Loading rack			
Blending operation			
Fugitive emissions			
4			
		Total	
		Running 12-Month Total <sup>5</sup>	

1 Duplicate and fill out this form each month.

2 Obtain VOC emission factor from AP-42, FIRE, TANKS, or mass balance. (Include documentation.)

3 Column D = Column B x Column C / 2000

4 Blank rows are for any additional emission sources of VOC.

5 Running 12-Month Total = Previous 11 months' Totals + current month's Total

If this "Running 12-Month Total" is not more than 99.00 tons, then installation is in compliance with the first emission limitation of Permit Condition PW001.

**ATTACHMENT A2**

**Monthly Individual HAP Emissions Tracking Record**

For month of \_\_\_\_\_, year of \_\_\_\_\_

For HAP Name: \_\_\_\_\_ CAS No.: \_\_\_\_\_ <sup>1</sup>

Company Name: Superior Solvents and Chemicals, Inc - Springfield  
Facility Location: 2055 E. Blaine St., Springfield, MO 65803

Greene County

Facility ID: 077-0228

Column A	Column B	Column C <sup>2</sup>	Column D <sup>3</sup>
Emission Source	Amount of Material Processed (gallons)	Individual HAP Emission Factor (pounds/gallon)	Monthly Individual HAP Emissions (tons)
Tank 1 <sup>4</sup>			
Tank 2			
Tank 3			
Tank 4			
Tank 5			
Tank 6			
Tank 7			
Tank 8			
Tank 9			
Tank 10			
Tank 11			
Tank 12			
Tank 13			
Tank 14			
Tank 15			
Tank 16			
Tank 17			
Tank 18			
Tank 19			
Tank 20			
Container filling			
Loading rack			
Blending operation			
Fugitive emissions			
5			
		Total	
		Running 12-Month Total <sup>6</sup>	

1 Duplicate and fill out this form each month for each HAP emitted.

2 Obtain HAP emission factor from AP-42, FIRE, TANKS or mass balance. (Include documentation.)

3 Column D = Column B x Column C / 2000

4 If a particular emission source does not emit this particular HAP, leave the row blank.

5 Blank rows are for any additional emission sources of this HAP.

6 Running 12-Month Total = Previous 11 months' Totals + current month's Total

If this "Running 12-Month Total" is not more than 9.00 tons for any HAP emitted, then installation is in compliance with the second emission limitation of Permit Condition PW001.

Company Name: Superior Solvents and Chemicals, Inc - Springfield  
Facility Location: 2055 E. Blaine St., Springfield, MO 65803      Greene County      Facility ID: 077-0228

- 1 Duplicate and fill out this form each month
- 2 Copy from heading of one Monthly Individual HAP Emissions Tracking Record for this month and year. There will be one row on this form for each Monthly Individual HAP Emissions Tracking Record for this month and year.
- 3 Copy from "Running 12-Month Total" on the same Monthly Individual HAP Emissions Tracking Record as in 2 above.
- 4 Combined Running 12-Month Total = total of all figures in Column C

If "Combined Running 12-Month Total" is not more than 24.00 tons, then installation is in compliance with the third and final emission limitation of Permit Condition PW001.

## ATTACHMENT B

This attachment may be used to demonstrate compliance with Permit Condition EU0010-001, which is based on regulation 10 CSR 10-4.040, Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating.

The natural gas fired boilers (EU0010) were installed after September 24, 1971, so they are new for the purposes of this regulation. They are the only indirect heating sources within this installation and each has a heat input of 1 MMBtu/hr, so 2 MMBtu/hr is the total heat input for the installation. The emission limit factor of 0.6 lb/MMBtu is from regulation 10 CSR 10-4.040. The emission factor of  $(7.6 \text{ lb/mmft}^3 \times 10^6 \text{ mmft}^3 / 1020 \text{ MMBtu})$  for natural gas combustion is from Table 1.4.2 in U.S. EPA document AP-42, Compilation of Air Pollutant Emission Factors; Volume I, Stationary Point and Area Sources, Fifth Edition. (Note: This emission factor is dependent only on the fuel – natural gas – and not on the furnace used to combust it.)

$$\text{EmissionLimit} = \frac{0.6 \text{ lb}}{\text{MMBtu}} (\text{HeatInput}) = \frac{0.6 \text{ lb}}{\text{MMBtu}} \left( \frac{2 \text{ MMBtu}}{\text{hr}} \right) = 1.2 \frac{\text{lb}}{\text{hr}}$$

$$\text{PotentialEmissionRate} = \text{MHDR}(\text{EmissionFactor}) = \left( \frac{2 \text{ MMBtu}}{\text{hr}} \right) \left( \frac{7.6 \text{ lb}}{10^6 \text{ mmft}^3} \right) \left( \frac{10^6 \text{ mmft}^3}{1020 \text{ MMBtu}} \right) = 0.015 \frac{\text{lb}}{\text{hr}}$$

Since the potential emission rate is less than 2% of the emission limit, the emission unit will be in compliance as long as it burns natural gas exclusively.

## STATEMENT OF BASIS

### Voluntary Limitations

In order to qualify for this Intermediate State Operating Permit, the permittee has accepted voluntary, federally enforceable emission limitations. Per 10 CSR 10-6.065(5)(C)1.A.(VI), if these limitations are exceeded, the installation immediately becomes subject to 10 CSR 10-6.065(6) and enforcement action for operating without a valid part 70 operating permit. It is the permittee's responsibility to monitor emission levels and apply for a part 70 operating permit far enough in advance to avoid this situation. This may mean applying more than eighteen months in advance of the exceedance, since it can take that long or longer to obtain a part 70 operating permit.

### Permit Reference Documents

These documents were relied upon in the preparation of the operating permit. Because they are not incorporated by reference, they are not an official part of the operating permit.

- 1) Intermediate Operating Permit Application, received October 25, 2004;
- 2) 2004 Emissions Inventory Questionnaire, received March 28, 2005;
- 3) Operating Permit 2000-095, issued September 11, 2005; and
- 4) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.

### VOC and HAP Emission Sources

Following are the current sources of volatile organic compounds (VOC) and hazardous air pollutants (HAP) at this installation. These need to be accounted for when calculating plant wide VOC and HAP emissions for Permit Condition PW001.

- Fugitive emissions off tank farm, unloading solvents, etc. (EP1)
- Container filling (EP2)
- Loading rack (EP3)
- Tanks 1 through 20 (EP4)
- Blending operation in Tank 21, 1990, 1,500-gallon (EP5)

### Applicable Requirements Included in the Operating Permit but Not in the Application or Previous Operating Permits

In the operating permit application, the installation indicated they were not subject to the following regulation(s). However, in the review of the application, the agency has determined that the installation is subject to the following regulation(s) for the reasons stated.

- 1) Title VI – 40 CFR Part 82, Protection of Stratospheric Ozone, applies to any person that produces, transforms, destroys, imports or exports a controlled substance or imports or exports a controlled product. "Controlled substance" and "controlled product" refer to substances and products regulated under the Montreal Protocol on Substances that Deplete the Ozone Layer and sections 602, 603, 604, 605, 606, 607, 614 and 616 of the Clean Air Act Amendments of 1990, Public Law 101-549. This regulation is so generally applicable that it is now being included in all permits as a core permit requirement.



- 2) 10 CSR 10-4.040, Restriction of Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating, applies to the two boilers (EU0010), but has been included as a permit condition only for the purpose of restricting this emission unit to burning pipeline grade natural gas exclusively. As demonstrated by Attachment B, this will keep the emission unit within the emission limitation for this regulation.

This regulation does not apply to any of the other emission units at this installation, because they do not emit particulate matter.

- 3) 10 CSR 10-6.220, Restriction of Emission of Visible Air Contaminants, applies to the two 1MMBtu boilers (EU0010). However, AP-42, 1.5.3.1 states that liquefied petroleum gas does not produce visible emissions, even though it does produce a small amount of particulate matter. The same is true for natural gas. (See note (a) on Table 1.5.1 in that same section of AP-42.). Therefore an emission unit which burns natural gas will automatically be in compliance with this regulation. Since Permit Condition EU0010-001 restricts the boilers to burning pipeline grade natural gas exclusively, no additional monitoring, recordkeeping, or reporting is required to ensure compliance with this regulation.

This regulation does not apply to any of the other emission units at this installation, because they do not emit visible air contaminants.

- 4) 10 CSR 10-6.260, Restriction of Emission of Sulfur Compounds, does not apply to the boilers (EU0010). As long as they burn pipeline grade natural gas exclusively, they are exempt per 10 CSR 10-6.260(A)(1)2, and Permit Conditions EU0010-001 and EU0010-002 restrict them to doing so. This regulation is included only until such time as this exemption for natural gas is incorporated into the State Implementation Plan (SIP). In the meantime, as long as an emission unit burns pipeline grade natural gas exclusively, its emission rate for sulfur compounds will be in compliance with the SIP limitations.

#### **Other Air Regulations Determined Not to Apply to the Operating Permit**

The Air Pollution Control Program (APCP) has determined that the following requirements are not applicable to this installation at this time for the reasons stated.

- 1) 10 CSR 10-6.100, Alternate Emission Limits, does not apply to this installation because it is in an ozone attainment area.
- 2) 10 CSR 10-6.400, Restriction of Emission of Particulate Matter From Industrial Processes, and Chapter 6, Article III, Division 4 of the Code of the City of Springfield, Missouri, Particulate Matter From Industrial Processes do not apply to this installation. The only sources of particulate matter at this installation are the boilers (EU0010), and these regulations do not apply to the burning of fuel for indirect heating..

#### **Construction Permit Revisions**

The APCP has not issued any construction permits for this installation.

### **New Source Performance Standards Applicability**

- 1) 10 CSR 10-6.070, New Source Performance Regulations, and 40 CFR Part 60 Subpart Dc, Standards of Performance for Small Industrial – Commercial – Institutional Steam Generating Units, do not apply to the boilers at this installation, because they have maximum design heat input capacities of less than 10 MMBtu/hr.
- 2) 10 CSR 10-6.070, New Source Performance Regulations, and 40 CFR Part 60 Subpart Ka, Standards of Performance for Storage Vessels for Petroleum Liquid for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978 and prior to July 23, 1984, do not apply to the tanks at this installation. This subpart applies only to such vessels when they have a capacity greater than 151,416 liters (40,000 gallons.) All the tanks at this installation have capacities of 10,000 gallons or less. Subpart Kb, Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984, does not apply either. This subpart applies only to such vessels when they have a capacity greater than or equal to 75 cubic meters (20,000 gallons.) All the tanks at this installation were constructed in 1983 and have capacities of 10,000 gallons or less.

No other NSPS apply to this installation.

### **Maximum Achievable Control Technology Applicability**

- 1) 10 CSR 10-6.075, Maximum Achievable Control Technology Regulations/40 CFR 63 Subpart EEEE, National Emission Standards for Hazardous Air Pollutants: Organic Liquids Distribution (Non-Gasoline), does not apply to this installation. This regulation applies only to major sources of HAP, and specifies that the first compliance date for existing major sources is February 5, 2007. A memorandum issued by the U. S. Environmental Protection Agency on May 16, 1995, with the subject line "Potential to Emit for MACT Standards – Guidance on Timing Issues," states that "facilities may switch to area source status at any time until the 'first compliance date' of the standard." This installation submitted an Intermediate application by October 24, 2004, which is prior to the first compliance date specified in this regulation, so this regulation does not need to be included in this permit.
- 2) 10 CSR 10-6.075, Maximum Achievable Control Technology Regulations/40 CFR 63 Subpart DDDDD, National Emission Standards for Industrial, Commercial, and Institutional Boilers and Process Heaters, does not apply to this installation. This regulation applies only to major sources of HAP, and specifies that the first compliance date for existing major sources is September 13, 2007. This installation submitted an Intermediate application by October 24, 2004, which is prior to the first compliance date specified in this regulation. According to the memorandum mentioned in 1) above, this regulation does not need to be included in this permit.

No other MACT regulations apply to this installation.

### **National Emission Standards for Hazardous Air Pollutants Applicability**

- 1) 10 CSR 10-6.080, Emission Standards for Hazardous Air Pollutants/40 CFR 61 Subpart J, National Standards for Equipment Leaks (Fugitive Emission Sources) of Benzene does not apply to this installation, because it does not handle benzene. For the same reason, Subpart Y, Benzene Emissions From Benzene Storage Vessels; Subpart BB, Benzene Emissions From Benzene Transfer Operations; and Subpart FF, Benzene Waste Operations, do not apply

- 2) In the permit application and according to APCP records, there was no indication that any Missouri Air Conservation Law, Asbestos Abatement, 643.225 through 643.250; 10 CSR 10-6.080, Emission Standards for Hazardous Air Pollutants/40 CFR 61 Subpart M, National Standards for Asbestos; and 10 CSR 10-6.250, Asbestos Abatement Projects - Certification, Accreditation, and Business Exemption Requirements, apply to this installation. The installation is subject to these regulations if they undertake any projects that deal with or involve any asbestos containing materials. None of the installation's operating projects underway at the time of this review deal with or involve asbestos containing material. Therefore, the above regulations were not cited in the operating permit. If the installation should undertake any construction or demolition projects in the future that deal with or involve any asbestos containing materials, the installation must follow all of the applicable requirements of the above rules related to that specific project.

No other NESHAPs apply to this installation.

#### **Other Regulatory Determinations**

- 1) Code of the City of Springfield, Missouri, Chapter 6, Article III, Division 3, Particulate Matter From Fuel Burning Equipment, is not included in this permit. When in compliance with state regulation 10 CSR 10-4.040, Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating, the installation will automatically be in compliance with this Springfield regulation, which has an identical emission limitation.
- 2) Code of the City of Springfield, Missouri, Chapter 6, Article III, Division 2, Visible Air Contaminants, is not included in this permit. When in compliance with state regulation 10 CSR 10-6.220, Restriction of Emission of Visible Air Contaminants, the installation will automatically be in compliance with this Springfield regulation, which has less stringent emission limitations.

#### **Other Regulations Not Cited in the Operating Permit or the Above Statement of Basis**

Any regulation which is not specifically listed in either the Operating Permit or in the above Statement of Basis does not appear, based on this review, to be an applicable requirement for this installation for one or more of the following reasons.

- 1) The specific pollutant regulated by that rule is not emitted by the installation.
- 2) The installation is not in the source category regulated by that rule.
- 3) The installation is not in the county or specific area that is regulated under the authority of that rule.
- 4) The installation does not contain the type of emission unit which is regulated by that rule.
- 5) The rule is only for administrative purposes.

Should a later determination conclude that the installation is subject to one or more of the regulations cited in this Statement of Basis or other regulations which were not cited, the installation shall determine and demonstrate, to the Air Pollution Control Program's satisfaction, the installation's compliance with that regulation(s). If the installation is not in compliance with a regulation which was not previously cited, the installation shall submit to the APCP a schedule for achieving compliance for that regulation(s).

Prepared by:



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Cheryl Steffan

Environmental Engineer